

May 17, 2012

Mr. Joe Gowers
US Environmental Protection Agency Region 2
290 Broadway, 19th Floor
New York, NY 10007

To Whom It May Concern, EPA National Remedy Review Board:

We have been active members of the Ringwood Mines/Landfill Community Advisory Group (CAG) since January 2008. We joined the CAG and remain active in the CAG to have the opportunity to listen to the concerns of the Upper Ringwood community, provide access to their local officials in an informal setting, and to stay abreast of the activities of the EPA and Ford with regard to the ongoing cleanup.

This letter is written to inform the Remedial Review Committee that, while we are full members of the CAG and we are proud of the work the CAG has done and pleased with the progress being made, our membership in the CAG does not imply that we, or the Ringwood Borough Council, agree with or otherwise support all statements made by or on behalf of the CAG.

By way of example, let it be noted that we abstained from voting on this resolution. The second bullet point of the draft CAG Resolution for the NRRB states:

“State and Federal Health Agencies have documented a rise in unexplained cancers and deaths in this community. No other reasonable explanation could be found to explain this increase except for exposure to the chemicals disposed of here by the responsible party, Ford.”

This conflicts with what the New Jersey Department of Health and Senior Services presented in their “Health Consultation Report” at the December, 2011 CAG meeting which contains findings about cancer incidences in residents living in the Upper Ringwood Area from 1979 to 2008. While they found lung cancer in male residents statistically higher than expected, the overall cancer incidence and the incidence of several specific cancers was not elevated. Also, they could not conclude “that the increased incidence is attributable to site-related exposures.”

The Ringwood Borough Council will be forwarding official comments for the NRRB’s consideration which we concur with. The purpose of this letter is to clearly state that we do not support all statements made by or on behalf of the CAG as evidenced by the one example noted above.

Sincerely yours,

Linda M. Schaffer, Mayor, Borough of Ringwood
John M. Speer, Deputy Mayor

Attachment: Health Consultation, Cancer Incidence in the Population Living near the Ringwood Mines/Landfill Site, 1979-2008, dated December 13, 2001, prepared by the New Jersey Department of Health and Senior Services.

Health Consultation

Cancer Incidence in the Population Living near the
Ringwood Mines/Landfill Site, 1979-2008

RINGWOOD BOROUGH, PASSIAC COUNTY, NEW JERSEY

EPA FACILITY ID: NJD980529739

**Prepared by the
New Jersey Department of Health and Senior Services**

DECEMBER 13, 2011

Prepared under a Cooperative Agreement with the
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Atlanta, Georgia 30333

Summary

Introduction

The Ringwood Mines/Landfill Site (Ringwood Borough, Passaic County, New Jersey) includes abandoned mine shafts and surface pits, an inactive landfill and other disposal areas, and dozens of residences. In the late 1960s and early 1970s, wastes from the Ford Motor Company, including paint sludge, solvents and automobile parts, were dumped at the site. The draft Public Health Assessment (PHA) for the site (ATSDR 2006) concluded that there were completed exposure pathways to site-related contaminants in the past, by incidental ingestion of contaminated soil, sediment, paint sludge and surface water. Contaminants include heavy metals and organic chemicals associated with paint sludge and other sources.

The draft PHA presented an analysis of cancer incidence in the period 1979 through 2002 in the population living near the site. Overall cancer incidence was not elevated in the population, but lung cancer in males was statistically significantly elevated, based on six observed cases. Since the draft PHA was issued, an additional six years of cancer incidence data have become available for further analysis. This Health Consultation describes the methods used to examine cancer incidence and the results of these analyses.

NJDHSS and ATSDR have reached the following conclusion in this Health Consultation:

Conclusion

NJDHSS and ATSDR conclude that overall cancer incidence (all cancers combined) and the incidence of several specific cancers were not elevated in the community living near the Ringwood Mines/Landfill site in the time period 1979 through 2008, in comparison to cancer rates in the State of New Jersey. Lung cancer in males, however, was statistically significantly higher than expected, based on nine cases observed. Since the primary risk factor for lung cancer is tobacco smoking, it cannot be concluded that the increased incidence is attributable to site-related exposures.

This analysis of 30 years of cancer incidence in the population living near the Ringwood Mines/Landfill site does not suggest that potential exposures to site-related contamination have affected the cancer rate in the community.

Basis for Conclusion	Tobacco smoking is estimated to account for 85% of all lung cancer cases. Since the prevalence of tobacco smoking is not available for these cases, it is unknown what influence this important risk factor may have played.
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Environmental factors may be expected to affect cancer rates in males and females similarly, if exposure levels are comparable and there are no reasons to believe there are differences in sensitivity by sex. The fact that lung cancer is not elevated in females argues against an environmental factor as an underlying cause of the increase in lung cancer in males.

Next Steps	The NJDHSS and ATSDR have no further recommendations regarding cancer incidence investigation in relation to the Ringwood Mines/Landfill site.
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NJDHSS and ATSDR will continue participation in meetings of the Ringwood Community Advisory Group (CAG) as needed to address health concerns with community representatives.

For More Information

Copies of this Health Consultation will be provided to concerned residents via the township libraries and the Internet. NJDHSS will notify area residents that this report is available for their review and provide a copy upon request.

Questions about this Health Consultation should be directed to:

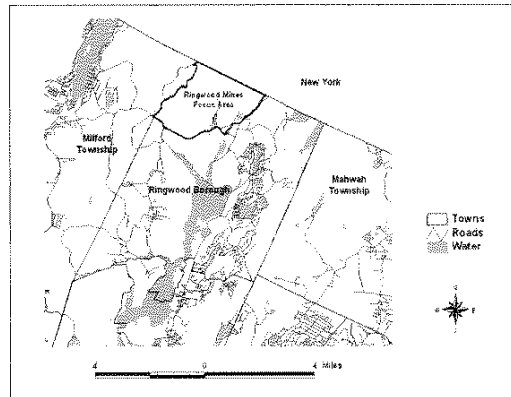
Environmental and Occupational Health Surveillance Program
Consumer and Environmental Health Services
New Jersey Department of Health and Senior Services
P.O. Box 369
Trenton, New Jersey 08625-0369
(609) 826-4984

Cancer Incidence in the Population Living near the Ringwood Mines/Landfill Site, 1979-2008

December 15, 2011

New Jersey Department of Health and Senior Services and
U.S. Agency for Toxic Substances and Disease Registry

- "Focus Area" defined by U.S. census blocks
- Time period from January 1, 1979 to December 31, 2008
- Population data from U.S. Census 2000 and 2010



Cancer Data and Analysis

- Data from New Jersey State Cancer Registry
- Cases diagnosed with a new primary cancer while residing in Focus Area, 1979-2008
- Analyses completed for these cancers:
 - bladder, brain, breast, colorectal, esophageal, pancreas, lung, leukemia, non-Hodgkin lymphoma, liver, bone, stomach, and kidney
- Compared observed number that would have occurred if State cancer rates occurred in the population ("expected")

Results

Cancer Type	Sex	Observed	Expected	Statistically Elevated?
All Cancers Combined	Male	20	16.0	No
	Female	12	14.3	No
Bladder	Male	<5	NR	No
	Female	0	0.32	No
Colorectal	Male	<5	NR	No
	Female	0	1.5	No
Non-Hodgkin Lymphoma	Male	<5	NR	No
	Female	<5	NR	No
Lung	Male	9	2.5	Yes
	Female	<5	NR	No
Breast	Female	<5	NR	No

Cancer types included for those with 2 or more cases

NR=not reported because observed number of cases less than five (<5).

Conclusion

- Overall cancer incidence and the incidence of several specific cancers not elevated, 1979-2008
- Lung cancer in males statistically higher than expected
 - Cannot conclude that the increased incidence is attributable to site-related exposures
 - Smoking information not known for cases so do not know what influence smoking had
 - Tobacco smoking causes 85% of all lung cancers